

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

*Newport News Division*

UNITED STATES OF AMERICA	)	CRIMINAL NO. 4:22-cr- <u>13</u>
	)	
v.	)	18 U.S.C. § 1349
	)	Conspiracy to Commit Bank Fraud
DESHAWN D. MOBLEY,	)	(Count 1)
(Counts 1-5, 7-14)	)	
	)	18 U.S.C. §§ 1344 and 2
LILWARREN T. M. JACKSON,	)	Bank Fraud
(Counts 1-14)	)	(Counts 2-6)
	)	
and	)	18 U.S.C. §§ 513(a) and 2
	)	Making, Uttering, and Possessing
WILBERT T. BOULDIN,	)	Counterfeit Securities of a Private
(Counts 1-14)	)	Entity
	)	(Counts 7-10)
Defendants.	)	
	)	18 U.S.C. §§ 1028A and 2
	)	Aggravated Identity Theft
	)	(Counts 11-14)
	)	
	)	18 U.S.C. §§ 492, 981(a)(1)(C), and
	)	982(a)(2)(A); 28 U.S.C. § 2461(c)
	)	Criminal Forfeiture

INDICTMENT

February 2022 Term – at Newport News, Virginia

GENERAL ALLEGATIONS

At all times relevant:

1. DESHAWN D. MOBLEY resided in the State of North Carolina.
2. LILWARREN T. M. JACKSON and WILBERT T. BOULDIN resided in

Richmond, Virginia, in the Eastern District of Virginia. JACKSON and BOULDIN are aspiring musicians who have released music under the moniker, “Rich Felons.”

3. American Fleet Service, Inc., is an automotive repair business located in Portsmouth, Virginia. American Fleet Service, Inc., is an organization operating in and affecting interstate and foreign commerce, as defined in Title 18, United States Code, Section 513(b)(4).

4. National Security & Door is a business that sells, installs, and services products in the security integration field and the distribution of architectural door and hardware products used in construction projects. The business is located in North Chesterfield, Virginia, and is an organization operating in and affecting interstate and foreign commerce, as defined in Title 18, United States Code, Section 513(b)(4).

5. RVA Construction, Inc., is a contractor in the construction business located in Ashland, Virginia. RVA Construction, Inc., is an organization operating in and affecting interstate and foreign commerce, as defined in Title 18, United States Code, Section 513(b)(4).

6. In or about April 2020, victim J.V. reported to Richmond Police Department that his wallet – which contained his driver's license and social security card – had been stolen from his vehicle.

7. On or about October 12, 2020, a business check (no. 10409) issued by American Fleet Service Inc. to DODSON Pest Control in the amount of \$50.00 was stolen from the U.S. mail in the Eastern District of Virginia.

8. Between on or about October 12, 2020, and on or about October 19, 2020, MOBLEY and his coconspirators made four counterfeit checks (nos. 10449, 10451, 10453, and 10455) drawn against the business bank account of American Fleet Service Inc. and made payable to victim J.V.

9. On or about October 19, 2020, MOBLEY and his coconspirators provided JACKSON and BOULDIN with the four counterfeit checks drawn against the business bank

account of American Fleet Service, Inc., the driver's license of victim J.V., and the social security card of victim J.V.

10. On or about October 19, 2020, JACKSON and BOULDIN used the social security card and driver's license of victim J.V. to negotiate the counterfeit checks for U.S. currency at the following financial institutions in the Eastern District of Virginia:

- a. Bay Port Credit Union, Williamsburg, Virginia (\$2,582.20 check issued by American Fleet Service, Inc., to victim J.V.).
- b. Bay Port Credit Union, Gloucester, Virginia (\$2,482.20 check issued by American Fleet Service, Inc., to victim J.V.).
- c. Bay Port Credit Union, Newport News, Virginia (\$2,382.20 check issued by American Fleet Service, Inc., to victim J.V.).
- d. Bay Port Credit Union, Hampton, Virginia (\$2,282.20 check issued by American Fleet Service, Inc., to victim J.V.).

11. In or about October 2020, a business check (no. 16218) issued by National Security & Door to A-1 Door Company in the amount of \$161.50 was stolen from the U.S. mail in the Eastern District of Virginia.

12. On or about October 30, 2020, MOBLEY and his coconspirators made a counterfeit check (no. 16243) drawn against the bank account of National Security & Door and made payable to victim J.V. in the amount of \$1,771.22. MOBLEY and his coconspirators provided the counterfeit check to JACKSON and BOULDIN to negotiate for U.S. currency.

13. On or about October 30, 2020, JACKSON and BOULDIN attempted to negotiate the counterfeit check in the amount of \$1,771.22 at Atlantic Union Bank in Richmond, Virginia. Atlantic Union Bank flagged the transaction as suspected fraud and notified law enforcement.

When police arrived, JACKSON and BOULDIN fled the bank premises in a Nissan sedan bearing Virginia license plate UFY-3851.

14. On or about December 28, 2020, BOULDIN and JACKSON opened bank accounts in their own names at First Community Bank in Richmond, Virginia.

15. On or about December 31, 2020, a business check (no. 26939) issued by RVA Construction, Inc., to Select Equipment, LLC, in the amount of \$26,046.51 was stolen from the U.S. mail in the Eastern District of Virginia.

16. On or about January 2, 2021, JACKSON deposited a stolen business check (no. 26939) issued by RVA Construction, Inc., to Select Equipment, LLC, in the amount of \$26,046.51 in his bank account at First Community Bank. JACKSON and BOULDIN subsequently withdrew at least \$330.00 in U.S. currency under the custody and control of First Community Bank.

17. Bay Port Credit Union, Atlantic Union Bank, and First Community Bank are financial institutions, as defined in Title 18, United States Code, Section 20. Bay Port Credit Union is a credit union with accounts insured by the National Credit Union Share Insurance Fund. Atlantic Union Bank and First Community Bank are insured by the Federal Deposit Insurance Act.



COUNT ONE  
(Conspiracy to Commit Bank Fraud)

THE GRAND JURY CHARGES THAT:

Between a date unknown, but believed to be no later than in or about October 2020, and continuing until in or about at least January 2021, the exact dates being unknown, in the Eastern District of Virginia and elsewhere, DESHAWN D. MOBLEY, LIL WARREN T. M. JACKSON, and WILBERT T. BOULDIN, the defendants herein, along other conspirators known and unknown, did knowingly and willfully combine, conspire, confederate and agree with each other and others known and unknown, to commit the following offense against the United States: to knowingly execute and attempt to execute a scheme and artifice to defraud and to obtain money, funds, assets, securities, and other property owned by and under the custody and control of a financial institution as defined under Title 18, United States Code, Section 20, by means of materially false and fraudulent pretenses, representations and promises in violation of Title 18, United States Code, Section 1344.

WAYS, MANNER AND MEANS OF THE CONSPIRACY

The ways, manner, and means by which the foregoing objectives of the conspiracy to commit bank fraud were to be accomplished included, but were not limited to the following:

1. The primary purpose of the conspiracy and scheme and artifice was for MOBLEY, JACKSON, and BOULDIN, along with other conspirators known and unknown, to defraud financial institutions by negotiating stolen checks for U.S. currency.
2. It was part of the conspiracy and scheme and artifice that coconspirators, known and unknown, stole checks from postal carrier routes in the Eastern District of Virginia.

3. It was part of the conspiracy and scheme and artifice that MOBLEY and his coconspirators used the financial information on the stolen financial instruments to make counterfeit checks drawn against the victims' bank accounts.

4. It was part of the conspiracy and scheme and artifice that coconspirators, known and unknown, stole the personally identifying information of victim J.V., including his driver's license and social security card.

5. It was part of the conspiracy and scheme and artifice that MOBLEY recruited JACKSON and BOULDIN to negotiate stolen and counterfeit checks at financial institutions in the Eastern District of Virginia.

6. It was part of the conspiracy and scheme and artifice that MOBLEY provided the personal information of victim J.V. to JACKSON and BOULDIN to obfuscate their identities when conducting the fraudulent bank transactions.

7. It was part of the conspiracy and scheme and artifice that MOBLEY, JACKSON, and BOULDIN obtained money under the custody and control of financial institutions and later split these fraud proceeds amongst the participants to the conspiracy.

(In violation of Title 18, United States Code, Sections 1349 and 1344.)

COUNT TWO THROUGH SIX  
(Bank Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. The factual allegations set forth in the General Allegations are incorporated herein as if set out in full.

2. On or about the dates and in the matter set forth below, in the Eastern District of Virginia and elsewhere, DESHAWN D. MOBLEY, LILWARREN T. M. JACKSON, and WILBERT T. BOULDIN, the defendants herein, aided and abetted by others, along with other conspirators known and unknown, did knowingly and willfully attempt to execute a scheme and artifice to defraud and to obtain the moneys, funds, credits, assets, and securities owned by and under the custody and control of Bay Port Credit Union, Atlantic Union Bank, and First Community Bank, all of which are financial institutions under Title 18, United States Code, Section 20, by means of the materially false and fraudulent pretenses, representations, and promises identified below:

Defendant	Count	Date (on or about)	Description of Transaction
MOBLEY, JACKSON, and BOULDIN	2	10/19/2020	The defendants negotiated a counterfeit check (no. 10449) drawn against the business bank account of America Fleet Service, Inc., for U.S. currency at Bayport Credit Union in Williamsburg, Virginia, in the amount of \$2,582.20.
MOBLEY, JACKSON, and BOULDIN	3	10/19/2020	The defendants negotiated a counterfeit check (no. 10453) drawn against the business bank account of America Fleet Service, Inc., for U.S. currency at Bayport Credit Union in Newport News, Virginia, in the amount of \$2,382.20.

MOBLEY, JACKSON, and BOULDIN	4	10/19/2020	The defendants negotiated a counterfeit check (no. 10455) drawn against the business bank account of America Fleet Service, Inc., for U.S. currency at Bayport Credit Union in Hampton, Virginia, in the amount of \$2,282.20.
MOBLEY, JACKSON, and BOULDIN	5	10/30/2020	The defendants attempted to negotiate a counterfeit check (no. 16243) drawn against the business bank account of National Security & Door for U.S. currency at Atlantic Union Bank in Richmond, Virginia, in the amount of \$1,771.22. JACKSON and BOULDIN fled the area after law enforcement responded to the bank flagging the transaction as suspected fraud.
JACKSON and BOULDIN	6	01/02/2021	The defendants negotiated a check (no. 26939) stolen from the U.S. mail – issued by RVA Construction, Inc., to Select Equipment, LLC, in the amount of \$26,046.41 – in JACKSON's personal bank account at First Community Bank. After the defendants' negotiated the stolen check, they withdrew at least \$330.00 in U.S. currency under the custody and control of First Community Bank.

(In violation of Title 18, United States Code, Sections 1344 and 2.)



COUNT SEVEN THROUGH TEN

(Making, Uttering, and Possessing Counterfeit Securities of a Private Entity)

THE GRAND JURY FURTHER CHARGES THAT:

1. The factual allegations set forth in the General Allegations are incorporated herein as if set out in full.

2. On or about the dates and in the manner set forth below, in the Eastern District of Virginia, DESHAWN D. MOBLEY, LIL WARREN T. M. JACKSON, and WILBERT T. BOULDIN, the defendants herein, aided and abetted by others known and unknown, and along with other conspirators known and unknown to the Grand Jury, did knowingly make, utter, and possess counterfeit securities of private entities, with intent to deceive other private organizations.

Defendant	Count	Date (on or about)	Description of Forged Security
MOBLEY, JACKSON, and BOULDIN	7	10/19/2020	The defendants, aided and abetted by others known and unknown, made, uttered, and possessed a counterfeit business check (no. 10449) drawn against the business bank account of American Fleet Service, Inc., and made payable to victim J.V. in the amount of \$2,582.20.
MOBLEY, JACKSON, and BOULDIN	8	10/19/2020	The defendants, aided and abetted by others known and unknown, made, uttered, and possessed a counterfeit business check (no. 10453) drawn against the business bank account of American Fleet Service, Inc., and made payable to victim J.V. in the amount of \$2,382.20.

MOBLEY, JACKSON, and BOULDIN	9	10/19/2020	The defendants, aided and abetted by others known and unknown, made, uttered, and possessed a counterfeit business check (no. 10455) drawn against the business bank account of American Fleet Service, Inc., and made payable to victim J.V. in the amount of \$2,282.20.
MOBLEY, JACKSON, and BOULDIN	10	10/30/2020	The defendants, aided and abetted by others known and unknown, made, uttered, and possessed a counterfeit business check (no. 16243) drawn against the business bank account of National Security & Door and made payable to victim J.V. in the amount of \$1,771.22.

(In violation of Title 18, United States Code, Sections 513(a) and 2.)

COUNTS ELEVEN THROUGH FOURTEEN  
(Aggravated Identity Theft)

THE GRAND JURY FURTHER CHARGES THAT:

1. The factual allegations set forth in the General Allegations are incorporated herein as if set out in full.

2. On or about the dates set forth herein, in the Eastern District of Virginia, DESHAWN D. MOBLEY, LILWARREN T. M. JACKSON, and WILBERT T. BOULDIN, the defendants herein, aided and abetted by others known and unknown, and along with conspirators known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally use, without lawful authority, a means of identification of another during and in relation to felony violations of provisions in Chapter 63 of Title 18, to wit: conspiracy to commit bank fraud, in violation of Title 18, United States Code, Section 1349; and bank fraud, in violation of Title 18, United States Code, Section 1344.

Defendant	Count	Date (on or about)	Means of Identification	Description of Transaction	Felony Violation
MOBLEY, JACKSON, and BOULDIN	11	10/19/2020	Personal identifiers of victim J.V., including Virginia driver's license number ending in 3339	Use of J.V.'s identifiers to negotiate counterfeit business check (no. 10449) drawn against the business bank account of American Fleet Service, Inc., for U.S. currency	18 U.S.C. §§ 1349, 1344  (ref. Counts 1 and 2)

MOBLEY, JACKSON, and BOULDIN	12	10/19/2020	Personal identifiers of victim J.V., including Virginia driver's license number ending in 3339	Use of J.V.'s identifiers to negotiate counterfeit business check (no. 10453) drawn against the business bank account of American Fleet Service, Inc., for U.S. currency	18 U.S.C. §§ 1349, 1344  (ref. Counts 1 and 3)
MOBLEY, JACKSON, and BOULDIN	13	10/19/2020	Personal identifiers of victim J.V., including Virginia driver's license number ending in 3339	Use of J.V.'s identifiers to negotiate counterfeit business check (no. 10455) drawn against the business bank account of American Fleet Service, Inc., for U.S. currency	18 U.S.C. §§ 1349, 1344  (ref. Counts 1 and 4)
MOBLEY, JACKSON, and BOULDIN	14	10/30/2020	Personal identifiers of victim J.V., including Virginia driver's license number ending in 3339	Use of J.V.'s identifiers to negotiate counterfeit business check (no. 16243) drawn against the business bank account of National Security & Door for U.S. currency	18 U.S.C. §§ 1349, 1344  (ref. Counts 1 and 5)

(In violation of Title 18, United States Code, Section 1028A and 2.)



FORFEITURE

THE GRAND JURY FURTHER FINDS PROBABLE CAUSE THAT:

1. The defendants, if convicted of any of the violations alleged in Counts One through Six of this Indictment, shall forfeit to the United States, as part of sentencing pursuant to Federal Rule of Criminal Procedure 32.2, any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of the violation.

2. The defendants, if convicted of any of the violations alleged in Counts Seven through Ten of this Indictment, shall forfeit to the United States, as part of sentencing pursuant to Federal Rule of Criminal Procedure 32.2:

- a. Any property, real or personal, which constitutes or is derived from proceeds traceable to the violation;
- b. All counterfeits of any coins or obligations or other securities of the United States or of any foreign government, and any articles, devices, or other things made, possessed, or used in violation of 18 U.S.C. § 470 et seq., or any material or apparatus used or fitted to intended to be used, in the making of such counterfeits, articles, devices, or things, which were possessed without proper authority.

3. If any property that is subject to forfeiture above is not available, it is the intention of the United States to seek an order forfeiting substitute assets pursuant to Title 21, United States Code, Section 853(p) and Federal Rule of Criminal Procedure 32.2(e.).

(In accordance with Title 18, United States Code, Sections 492, 981(a)(1)(C), and 982(a)(2)(A); Title 28, United States Code, Section 2461(c).)

UNITED STATES v. DESHAWN D. MOBLEY, et al.  
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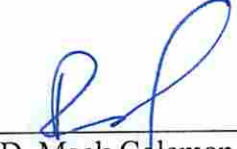
A TRUE BILL:

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